



DIVISION OF  
ENFORCEMENT

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
100 PEARL STREET, SUITE 20-100  
NEW YORK, NY 10004-2616

June 17, 2025

**VIA ECF**

Honorable Jesse M. Furman  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

RE: SEC v. Vanderbilt, No. 1:25-cv-04994-JMF

Dear Judge Furman:

Plaintiff Securities and Exchange Commission (the “SEC” or “Commission”) respectfully requests that the Court approve the proposed partial consent judgment (Dkt. No. 3, the “Proposed Judgment”) to which the Commission and Defendant Roderick Vanderbilt (“Vanderbilt”) have agreed. If entered, the Proposed Judgment would resolve the non-monetary relief that the SEC seeks against Vanderbilt but leave open for later resolution by motion (or further settlement) the monetary relief that the SEC seeks against Vanderbilt.

The Proposed Judgment is fair and reasonable and in the public interest. *See, e.g., SEC v. Citigroup Global Markets, Inc.*, 752 F.3d 285 (2d Cir. 2014) (setting out the standard for reviewing proposed consent judgments in government enforcement actions). Among other things, the Proposed Judgment would permanently enjoin and prohibit Vanderbilt from:

- committing violations of the federal securities laws that the SEC charges against him in this case; and
- serving as an officer or director of any company that has a class of securities registered under Section 12 of the Securities Exchange Act (“Exchange Act”) [15 U.S.C. § 78l] or that is required to file reports pursuant to Exchange Act Section 15(d) [15 U.S.C. § 78o(d)].

As described above, the Proposed Judgment would leave open for later resolution the issue of monetary relief. In a parallel criminal action, *United States v. Vanderbilt*, No. 24-cr-20560 (DSL) (S.D. Fla.), Vanderbilt has pled guilty to conspiracy to commit securities fraud in violation of 18 U.S.C. § 371 relating to certain matters alleged in the complaint in this action. Vanderbilt is currently scheduled for a status conference regarding sentencing in the criminal

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case on October 15, 2025. The SEC anticipates that the parties will attempt to negotiate a resolution of the monetary relief that the SEC seeks against Vanderbilt following resolution of that case.

The SEC therefore respectfully requests that the Court approve the Proposed Judgment and docket it with Vanderbilt's signed consent (Dkt. No. 3, Exhibit 1).

Respectfully submitted,

Travis Hill

Travis Hill  
SEC Division of Enforcement

cc: John Priovolos, Esq., counsel to Vanderbilt (by email)